

### REMARKS

Claims 15-70 are pending and stand rejected. Claims 15-70 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 6,215,496 to Szeliski et al., hereinafter "Szeliski," in view of Bastos "Increased Photorealism for Interactive Architectural Walkthroughs," hereinafter "Bastos," and further in view of U.S. Patent No., 6,163,319 to Peercy et al., hereinafter "Peercy." Applicant respectfully traverses the grounds for rejection and requests reconsideration and withdrawal of the rejections of claims 15-67 in view of the following.

#### *Information Disclosure Statement*

Applicant respectfully submits that the IDS is in compliance with 37 CFR 1.98(a)(2) because this application is a continuation of U.S. Patent Application Serial No. 09/369,359 and copies of the references have been filed in the parent case. Please see IDS filed in this application on October 27, 2003 at page 3, last paragraph citing to parent case.

#### *Rejections under 35 U.S.C. § 103*

Independent claims 15, 32, and 49 include features that are neither disclosed nor suggested by the cited references, either taken alone or in combination, namely as represented by claim 15:

15. (Previously Presented) A method for rendering an object having light reflective properties, the method comprising:

determining a destination viewing vector for rendering the object from a destination viewpoint;

*determining a set of source radiance environment maps each having an associated source viewing vector, each source viewing vector representing a different viewpoint associated with the source radiance environment map, each source radiance environment map including information indicative of a light reflective property of the object and comprising texels that each represent a pre-integrated value of total reflected radiance;*

warping each source radiance environment map of the set of source radiance environment maps based on the destination viewing vector and the source viewing vector associated with the source radiance environment map; and

blending the warped source radiance environment maps to create a destination radiance environment map. (emphasis added)

The claims are directed to a novel technique for rendering an object whose surface has light reflective properties. Conventional rendering of such objects is performed with integration of the lighting equation for each frame rendered. Integration of the lighting equation is highly processor intensive and therefore, not conducive to interactive rendering (application as originally filed at page 2, line 1 through page 4, line 4). The invention overcomes the need for *integrating the lighting equation* or for performing other integrations for each display frame by starting with a set of source radiance environment maps having ***pre-integrated total reflected radiance values***. In this manner, an object whose surface has light reflective properties can be more quickly rendered (although possibly with some small loss in accuracy).

Szeliski does *not* disclose or suggest source radiance environment maps that include values representative of ***pre-integrated total reflected radiance***, as recited by the claims. The examiner appears to agree (Office Action at page 3).

Bastos does not cure the deficiencies of Szeliski. Bastos does not disclose or suggest source radiance environment maps that include values representative of ***pre-integrated total reflected radiance values***. The examiner appears to agree (Office Action at page 4). Applicant appreciate the examiner's reconsideration of this issue.

The examiner now relies on Peercy for disclosing pre-integrated total reflected radiance values in a source radiance environment map having an associated source viewing vector, each source viewing vector representing a different viewpoint associated with the source radiance environment map. Applicant respectfully submits, however, that Peercy suffers from deficiencies similar to Bastos. As shown in Peercy at Figure 2A, the only steps that are "pre-computed" (*not pre-integrated*) are steps 210 and 220 which calculate conventional bump texture maps (not source radiance environment maps...having an associated source viewing vector...comprising texels that each represent a pre-integrated value of total reflected radiance) (Peercy at Fig. 2A). Peercy does not really address lighting until the later steps, e.g., steps 240-290 (Peercy at Fig. 2A). Therefore, Peercy does not pre-integrate any values, let alone total reflected

radiance values for source radiance environment maps having an associated source viewing vector, as recited by the claims.

While Peercy notes that filtering can be performed on bumps by computing the reflected radiance over all bumps (Peercy at 11:45-8), this is simply a statement that one can use the conventional lighting equation to determine the lighting on a bumped surface. The bump texture maps of Peercy contain only surface geometric properties (Peercy at 11:12-36) and do not contain pre-integrated total reflected radiance values (or any lighting information). Moreover, the bump texture maps of Peercy do not have an associated source viewing vector because the texture bump maps are not view dependent (Peercy at 11:12-36). (Still further, because texture bump maps are not view dependent (i.e., they do not have an associated viewing vector), they are not amenable to warping and blending together.

Thus, Peercy simply notes that one can perform the conventional lighting equation to determine lighting on a bumped surface. Peercy a) does not disclose or suggest a source radiance environment map having a pre-integrated total reflected radiance value, b) does not disclose or suggest a source radiance map having an associated source viewing vector, and c) cannot suggest the use of any lighting information in blending and warping because of the lack of source viewing vectors (Peercy's texture bump maps are view independent).

Accordingly, applicant submits that the cited references, either taken alone or in combination, do not disclose or suggest the features of independent claims 15, 32, and 49. Additionally, inasmuch as dependent claims 16-31, 33-48, and 50-70 (which have also been rejected) are dependent from claim 15, 32, or 49, these claims are patentable over the cited references, at least by virtue of their dependency. Accordingly, applicant respectfully requests reconsideration and withdrawal of the rejections of and objections to claims 15-70 under 35 U.S.C. § 103.

### ***Conclusion***


For all the foregoing reasons, applicant respectfully submits that the application is now in condition for allowance. Reconsideration of the office action and an early notice of allowance

**DOCKET NO.:** MSFT-2830/191773.2  
**Application No.:** 10/694,470  
**Office Action Dated:** July 12, 2005

**PATENT  
REPLY FILED UNDER EXPEDITED  
PROCEDURE PURSUANT TO  
37 CFR § 1.116**

are respectfully requested. In the event that the examiner cannot allow the present application for any reason, the examiner is encouraged to contact the undersigned attorney, Raymond N. Scott Jr. at (215) 564-8951, to discuss resolution of any remaining issues.

Date: September 9, 2005



---

Raymond N. Scott, Jr.  
Attorney for Applicant  
Registration No. 48,666

Woodcock Washburn LLP  
One Liberty Place - 46th Floor  
Philadelphia PA 19103  
Telephone: (215) 568-3100  
Facsimile: (215) 568-3439